

1 DAVID R. ZARO (BAR NO. 124334)  
2 TED FATES (BAR NO. 227809)  
3 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
4 515 South Figueroa Street, Ninth Floor  
Los Angeles, California 90071-3309  
Phone: (213) 622-5555  
Fax: (213) 620-8816  
5 E-Mail: dzaro@allenmatkins.com  
tfates@allenmatkins.com  
6

7 Attorneys for Receiver  
THOMAS A. SEAMAN  
8

9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13  
14 **SAN JOSE DISTRICT**  
15

16 SECURITIES AND EXCHANGE  
17 COMMISSION,  
18

Plaintiff,

19 vs.  
20

21 SMALL BUSINESS CAPITAL CORP.;  
22 MARK FEATHERS; INVESTORS PRIME  
23 FUND, LLC; and SBC PORTFOLIO  
24 FUND, LLC,  
25

26 Defendants.  
27

28 Case No. CV12-03237  
RECEIVER'S ADMINISTRATIVE  
MOTION FOR PAYMENT OF LOAN  
SERVICING COSTS FOR FEBRUARY 2015  
Ctrm: 4 - 5th Floor  
Judge: Hon. Edward J. Davila

1 Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver for Small  
 2 Business Capital Corp. ("SB Capital"), Investors Prime Fund, LLC ("IPF"), SBC Portfolio  
 3 Fund, LLC ("SPF"), and their subsidiaries and affiliates (collectively, "Receivership Entities"),  
 4 hereby submits this Application for Payment of Loan Servicing Costs for February 2015. In its  
 5 order entered on August 7, 2014, the Court authorized the Receiver to submit monthly bills for  
 6 loan servicing costs, starting with August 2014. Docket No. 936.

7 The total cost of servicing the loan portfolios for February 2015 was \$20,709.50. A  
 8 complete list of each task performed is attached as Exhibit A. During February, servicing fees  
 9 were significantly less than the budget as the sale of the 504 loans was completed in January and  
 10 there were therefore less loans to service. However, costs increased over the prior month  
 11 primarily due to difficulties with the 3-AM foreclosure which has been aggressively contested by  
 12 the borrower. These efforts continued in March, including a trial in Maryland state court. March  
 13 servicing fees are expected to be similar to February costs.

14 Based on the foregoing, the Receiver respectfully requests Court approval and authority to  
 15 pay the February 2015 loan servicing costs of \$20,709.50.

16 Dated: April 13, 2015

17 ALLEN MATKINS LECK GAMBLE  
 18 MALLORY & NATSIS LLP

19 By: /s/ Ted Fates  
 20 TED FATES  
 21 Attorneys for Receiver  
 22 Thomas A. Seaman

# **EXHIBIT A**

Thomas Seaman Company  
 3 Park Plaza  
 Suite 550  
 Irvine, CA 92614

Invoice submitted to:  
 Thomas Seaman, Receiver for SBC  
 3 Park Plaza  
 Suite 550  
 Irvine, CA 92614

April 13, 2015

Invoice #11172

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
<u>Loan Servicing</u>				
2/24/2015	CM	Loan Servicing Processed a Mailing: stuffed, sealed and stamped notices.	0.80 60.00/hr	48.00
2/2/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Closing books for the previous month, ran month-end reports, finalized Colson 1502 report, and tied out to ABS, cleared out check registers.	4.50 135.00/hr	607.50
2/3/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Updated tax return/financials tracker with borrowers who had forwarded financials requested, added info to file, and printed out for review.	5.00 135.00/hr	675.00
2/12/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Stopped monthly ACH's for borrowers with loans that were sold to Western Alliance. Processed loan payoff for One Stop Nutrition in ABS, did a final 1502 report, wired Colson their share of the funds, and emailed them notice of the payoff along with the completed Prepayment Certification form.	4.50 135.00/hr	607.50
2/13/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending	4.00 135.00/hr	540.00

Thomas Seaman, Receiver for SBC

Page 2

			<u>Hrs/Rate</u>	<u>Amount</u>
		matters, entered deposits. For 504 and other non-SBA loan payments received, posted them, and calculated the amount owed to Western Alliance for them, created a spreadsheet, and wired them the money. Sent wire to California Business Bank for the rest of their share of Feb loan payments.		
2/16/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	1.50 135.00/hr	202.50
2/17/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.70 135.00/hr	364.50
2/18/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.70 135.00/hr	364.50
2/19/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Did updated loan payoff demand letter to Ganlaon Corp. and sent to borrower.	3.00 135.00/hr	405.00
2/20/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.50 135.00/hr	337.50
2/23/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.70 135.00/hr	364.50
2/24/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Correspondence with Seth at Western alliance regarding a borrower's request for a 2014 1098.	2.00 135.00/hr	270.00
2/25/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Correspondence with Seth at Western Alliance regarding Valley Produce's lack of response to them. Updated the loan payoff demand letter for SO2 LLC and sent to the escrow agent.	2.70 135.00/hr	364.50

Thomas Seaman, Receiver for SBC

Page 3

			<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits.	2.00 135.00/hr	270.00
2/27/2015	KJ	Loan Servicing Posted loan payments, updated 1502 & other loan participant reports, correspondence with borrowers, touched base with Rafael on pending matters, entered deposits. Processed loan payoff for SO2 LLC in ABS, created final 1502 report, wired Colson their share of the payoff, and emailed them the notice of payoff, along with the completed Prepayment Certification form.	2.50 135.00/hr	337.50
2/2/2015	MRF	Loan Servicing Call with Kallappa Rampur re upcoming ACH payment date and new lender's contact info.	0.20 65.00/hr	13.00
2/3/2015	MRF	Loan Servicing Deposited payments received and made the accompanying entries to Quickbooks for those received on 1/29 & 1/30.	0.90 65.00/hr	58.50
	MRF	Loan Servicing Deposited, updated tracking, and made the accompanying accounting entries to Quickbooks for borrower payments received on 2/2 & 2/3.	1.30 65.00/hr	84.50
2/9/2015	MRF	Loan Servicing Spoke Kallappa Rampur re returned ACH loan payment and funding status. Gave instructions to Kristen re taking payment again.	0.30 65.00/hr	19.50
	MRF	Loan Servicing Filed financial statements received from borrowers and filed in corresponding borrower folders. Updated tracking and responded to borrowers re same.	0.60 65.00/hr	39.00
	MRF	Loan Servicing Spoke with borrower Hotel Miramar and authorized appraisal company to forward a copy of the appraisal to Mr. Bhakta.	0.20 65.00/hr	13.00
	MRF	Loan Servicing Began checking county tax websites to ensure that all 7(a) borrowers had paid their recent property tax installments per the loan agreements.	1.70 65.00/hr	110.50
	MRF	Loan Servicing Received borrower payments for February, deposited, and made the accompanying accounting entries to Quickbooks.	0.90 65.00/hr	58.50
2/10/2015	MRF	Loan Servicing Call with Kallappa Rampur re acceptance of missed payments.	0.10 65.00/hr	6.50

Thomas Seaman, Receiver for SBC

Page 4

			<u>Hrs/Rate</u>	<u>Amount</u>
2/10/2015	MRF	Loan Servicing Phone call with Sun-Fax Arco re receipt of February's payment.	0.20 65.00/hr	13.00
	MRF	Loan Servicing Prepared and sent updated insurance and property tax payment reports to Rafael G.	0.30 65.00/hr	19.50
	MRF	Loan Servicing Logged borrower loan payments received for 2/9 & 2/10.	0.40 65.00/hr	26.00
2/12/2015	MRF	Loan Servicing Completed checking the county tax websites to ensure that all 7(a) borrowers had paid their recent property tax installments per the loan agreements. Finalized report and gave updated report to Rafael to notify borrowers who had missed their recent payment.	1.40 65.00/hr	91.00
2/13/2015	MRF	Loan Servicing Deposited and made the accompanying entries to Quickbooks for 7(a) borrower loan payments received 2/5 & 2/6.	1.20 65.00/hr	78.00
2/17/2015	MRF	Loan Servicing Performed follow-up reviews on borrowers with delinquent property tax payments and checked county tax sites to ensure that they brought their payments current.	0.50 65.00/hr	32.50
	MRF	Loan Servicing Prepared Fedex to C. Hopkin re 3AM foreclosure documents and to TB Insurance re delinquent property taxes.	0.30 65.00/hr	19.50
	MRF	Loan Servicing Added checks received to master log, deposited, and made the accompanying accounting entries to Quickbooks for checks received 2/7 through 2/13.	2.80 65.00/hr	182.00
2/18/2015	MRF	Loan Servicing Reviewed the Meyer's Castle loans delinquent payment amounts and forwarded details to Rafael to take further action.	0.20 65.00/hr	13.00
2/19/2015	MRF	Loan Servicing Received request from borrower for their 2014 loan statements and for a change of mailing address. Changed address and forwarded statement to borrower.	0.30 65.00/hr	19.50
	MRF	Loan Servicing Prepared mailings of notification letters to borrowers re upcoming property tax payment.	0.40 65.00/hr	26.00
	MRF	Loan Servicing Reviewed emails/messages re verification of mortgage for Leticia Luna.	0.20 65.00/hr	13.00

Thomas Seaman, Receiver for SBC

Page 5

			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2015	MRF	Loan Servicing		
		Responded to messages received re Luna verification of mortgage. Pulled statements/documents and sent info requested to third party per Luna's request.	0.90 65.00/hr	58.50
2/23/2015	MRF	Loan Servicing		
		Received late payment from Bragato, deposited, and made the accompanying accounting entries to Quickbooks.	0.30 65.00/hr	19.50
2/24/2015	MRF	Loan Servicing		
		Received verification from TB Insurance that their property taxes were brought current. Updated tracking sheet and filed verification.	0.30 65.00/hr	19.50
2/25/2015	MRF	Loan Servicing		
		Received additional financial statements requested from the 7(a) borrowers. Responded to borrowers and filed the statements received re same.	0.50 65.00/hr	32.50
2/26/2015	MRF	Loan Servicing		
		Reviewed & printed the 7(a) borrower property tax notices, printed mailing labels, and gave directions to Cindy re mailing of same.	0.50 65.00/hr	32.50
2/27/2015	MRF	Loan Servicing		
		Spoke with Randy from Airport Blvd. re updated loan statement for their accounting. Emailed Kristen re acquiring the statement from Wells Fargo.	0.20 65.00/hr	13.00
2/28/2015	MRF	Loan Servicing		
		Downloaded the scanned 7(a) loan files onto a flash drive per Rafael's request.	0.30 65.00/hr	19.50
2/29/2015	MRF	Loan Servicing		
		Met with Rafael to discuss outstanding borrower technical defaults for property taxes, insurance coverage, and payments.	0.30 65.00/hr	19.50
3/1/2015	MRF	Loan Servicing		
		Responded to borrowers who had forwarded financial statements. Filed and added the statements to tracking.	0.40 65.00/hr	26.00
3/2/2015	MRF	Loan Servicing		
		Phone call with Sun-Fax Arco re March payment statement. Pulled statement and faxed at borrower's request.	0.30 65.00/hr	19.50
3/3/2015	RVG	Loan Servicing		
		Spoke, responded & discussed with legal counsel's (C. Hopkin) email/phone call at length re: 3 AM LLC's ratification of foreclosure sale, distribution of sales proceeds & pursuit of guarantors on potential deficiency judgment.	0.80 200.00/hr	160.00
3/4/2015	RVG	Loan Servicing		
		Researched & responded to Everton Santos (Avana Capital) email, copied S. Park (SBA)/Thomas Seaman (Receiver)/C. Hopkin (legal counsel) re: 3 AM LLC's Foreclosure Sale proceeds distribution	0.40 200.00/hr	80.00

Thomas Seaman, Receiver for SBC

Page 6

			<u>Hrs/Rate</u>	<u>Amount</u>
(pro-rata share) & pursuit of guarantors for potential deficiency judgment.				
2/9/2015	RVG	Loan Servicing Exchanged, responded & discussed with legal counsel (C. Hopkin) re: Orchestrating strategies on 3 AM LLC's Motion on Objections/Exceptions to Ratify Foreclosure Sale.	0.60 200.00/hr	120.00
	RVG	Loan Servicing Met with Kristen J. (Receiver's agent) re: 3 AM LLC's claim for payoff amount.	0.30 200.00/hr	60.00
	RVG	Loan Servicing Revisited, researched & reviewed all emails that pertains to 3 AM LLC's Claim for a Request for Payoff Amount.	0.80 200.00/hr	160.00
2/10/2015	RVG	Loan Servicing Exchanged & responded to legal counsel's (C. Hopkin) emails/phone call copied Thomas Seaman re: 3 AM LLC's Objections/Exceptions to Ratification of Foreclosure Sale.	0.30 200.00/hr	60.00
	RVG	Loan Servicing Per legal counsel's (C. Hopkin) request re: Again, revisited, researched & reviewed all emails that pertains to 3 AM LLC's Claim for a Request for Payoff Amount more specifically the months of October thru December 2014.	1.10 200.00/hr	220.00
2/11/2015	RVG	Loan Servicing Revisited & reviewed 3 AM LLC's Motion for Exceptions To Foreclosure Sale of 3 AM LLC Of Its Hotel re: Causes of Action & Statement of Facts.	0.40 200.00/hr	80.00
2/12/2015	RVG	Loan Servicing Phone call from C. Hopkin to discuss at length timeline regarding borrower's (3 AM LLC) claim for payoff to multiple efforts to refinance indebtedness & to discuss information as well as input facts to Rafael Garcia's Declaration re: Motion for Exceptions to Foreclosure Sale of 3 AM LLC of its Hotel.	0.80 200.00/hr	160.00
	RVG	Loan Servicing Responded to Connie Ho's (Escrow Officer) email copied Kristen J./Thomas Seaman (Receiver) re: One Stop Nutrition's Beneficiary Demand Payoff Statement.	0.20 200.00/hr	40.00
2/16/2015	RVG	Loan Servicing Responded & spoke to Leticia Luna's (Borrower) emails/phone call message copied/forwarded to Matthew F./Thomas Seaman (Receiver) re: Borrower's Changed of Mailing Address.	0.30 200.00/hr	60.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated & sent via FED EX the Technical Default Demand Letters to various loans (TB Insurance, Elizabeth Urquiza, Lizgio LLC, Lillie Alexander, Gusharan	4.60 200.00/hr	920.00

Thomas Seaman, Receiver for SBC

Page 7

			<u>Hrs/Rate</u>	<u>Amount</u>
		Singh, Robert Marshall) re: SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.		
2/17/2015	RVG	Loan Servicing Received, reviewed, executed & forwarded the Affidavit of Declaration prepared/drafted by legal counsel (C. Hopkin) re: Response to 3 AM LLC's (Opposition) Motion for Exceptions of Foreclosure Sale.	0.60 200.00/hr	120.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated & sent via FED EX the Technical Default Demand Letters to various loans (Charles Pitts, Gina Bianchi, Robert Marshall, TRC Holdings, Z&H Happy Hands, Iguanas Real Estate Holdings) re: SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	5.10 200.00/hr	1,020.00
2/18/2015	RVG	Loan Servicing Telephone call from legal counsel (C. Hopkin) & discussed at length the changes/modification re: Rafael Garcia's Affidavit of Declaration for 3 AM LLC's Motion to Opposition to Exception to Receiver's Foreclosure Sale; Telephone conference with legal counsel (C. Hopkin) & B. Huffman (Buyer's Counsel) & discussed re: Response & Court Dates (Hearing) filing re: Same as above.	1.20 200.00/hr	240.00
	RVG	Loan Servicing Reviewed & forwarded changes/modifications of Rafael Garcia's Affidavit of Declaration to legal counsel (C. Hopkin) re: 3 AM LLC's Opposition to Exception to Receiver's Foreclosure Sale's Ratification.	0.60 200.00/hr	120.00
	RVG	Loan Servicing Exchanged, responded & reviewed reports with M. Flahive (Receiver's agent) re: Servicing Issues on various loans pertaining to Delinquent Property Taxes/Financial Statements/Late Charges, etc. on SBC's 7(a) loans.	0.40 200.00/hr	80.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated & sent via FED EX the Technical Default Demand Letters to various loans (Alexis Readinger, Amy Lin-Pineda, Arutyun Kusoyan, Shema Sherwin, Intervention 911, Jose Sanchez, Kevin Pham, KV Equity) re: SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.70 200.00/hr	940.00
2/19/2015	RVG	Loan Servicing Exchanged & conferred emails/phone calls with legal counsel (C. Hopkin) re: Filing Response & Rafael Garcia's Affidavit of Declaration to 3 AM LLC's Opposition to Exception on Receiver's Foreclosure Sale's Ratification; Received & reviewed Affidavit of Declaration (Final	1.10 200.00/hr	220.00

Thomas Seaman, Receiver for SBC

Page 8

			Hrs/Rate	Amount
		Version) from legal counsel (C. Hopkin) re: Same as above.		
2/19/2015	RVG	Loan Servicing Responded to Borrower's (Leticia Luna) email/phone call copied Matthew F. (Receiver's agent) re: Business Change of Address; Notified SBA re: Same as above.	0.40 200.00/hr	80.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (Arutyun Kosuyan, David Sherwin, JV Mattress, Nina Sanai, Sun-Fax Arco, Strawberry Inn) re: SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.20 200.00/hr	840.00
	RVG	Loan Servicing Forwarded (via email) notification letters to Mattew F. (Receiver's) re: Technical Default Notification Letters to SBC's 7(a) borrowers.	0.30 200.00/hr	60.00
2/20/2015	RVG	Loan Servicing Received & reviewed from Kristen J. (Receiver's agent) Final Version of Loan Schedule Balances Update on SBC's 7(a) loan portfolio copied Business US (Buyer) & P. Beauchamp (Broker).	0.60 200.00/hr	120.00
	RVG	Loan Servicing Responded to borrowers' (TB Insurance/TRC Holdings) emails/phone calls re: Technical Default Notification Letters sent to SBA 7(a) borrowers.	0.80 200.00/hr	160.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (Bertha Sanchez, Mary O'Brien, Ganlaon Corp., Ferchoff Sedona, John Bichler, Naren Bhakta, VS Investment) re: SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.40 200.00/hr	880.00
2/23/2015	RVG	Loan Servicing Received & responded to Tim McDonnell's (Receiver's agent) email/phone call message copied Thomas Seaman (Receiver) re: Meyer's Castle Insurance Coverage (Technical Default/Insurance Coverage Renewal.)	0.30 200.00/hr	60.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (Alexis Readinger, Amy Pineda, Gina Bianchi, John Bichler, Kevin Pham, Lillie Mellovanovic, Mary O'Brien, Nina Sanai) SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) &	4.70 200.00/hr	940.00

Thomas Seaman, Receiver for SBC

Page 9

			<u>Hrs/Rate</u>	<u>Amount</u>
		future Site Visit notification.		
2/24/2015	RVG	Loan Servicing Forwarded (via email) notification letters to Mattew F. (Receiver's agent) re: Technical Default Notification Letters to SBC's 7(a) borrowers.	0.40 200.00/hr	80.00
	RVG	Loan Servicing Responded to Tim M. (Receiver's agent) copied Thomas Seaman (Receiver) re: Meyer's Castle lapsed Insurance Coverage & Forced Placed Insurance.	0.20 200.00/hr	40.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (Robert Smith, Larry Bragato, Kyo Kim, Arutyun Kusoyan, Jose Sanchez, Vaidotas Vaitys) SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.30 200.00/hr	860.00
2/25/2015	RVG	Loan Servicing Responded to Everton Santos (Avana) copied Thomas Seaman (Receiver), P. Beauchamp (Broker), S. Park (SBA), C. Hopkin (Atty) re: 3 AM LLC's Foreclosure Sale Ratification & distribution of proceeds.	0.20 200.00/hr	40.00
	RVG	Loan Servicing Exchanged, responded & conferred with legal counsel (C. Hopkin) re: Court Hearing Date & Testimonial appearance of Rafael Garcia (Receiver's agent)/Jerod Byrd (Appraiser) on 3 AM LLC's Opposition to Exception Not to Ratify Receiver's Foreclosure Sale; Telephone conference with legal counsel (C. Hopkin) & Jerod Byrd (Appraiser) re: Same as above.	0.90 200.00/hr	180.00
	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (Robert Marshall, Pamela Pitts, Leticia Luna, Lizgio LLC, Elizabeth Urquiza, Z&H Happy Hands, Iguanas RE, TRC Holdings) SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.80 200.00/hr	960.00
2/26/2015	RVG	Loan Servicing Met with Tim M. (Receiver's agent) several times re: Meyer's Castle's Insurance Coverage & Forced Placed Insurance.	0.40 200.00/hr	80.00
	RVG	Loan Servicing Forwarded email of Connie Ho (Escrow Officer) to Thomas Seaman (Receiver)/P. Beauchamp (Broker) re: SO2 LLC dba Wok Star Loan Payoff Wire Transfer.	0.20 200.00/hr	40.00

Thomas Seaman, Receiver for SBC

Page 10

			<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2015	RVG	Loan Servicing Researched, revisited, prepared, drafted, formulated, finalized & sent via FED EX the Technical Default Demand Letters to various loans (8090 Professional Bldg., Thrifty Rooter, David Sherwin, Myers Castle, Ferchoff Sedona, Ganlaon Corp., Tropicana Liquor, Intervention 911, JV Mattress) SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.50 200.00/hr	900.00
2/27/2015	RVG	Loan Servicing Researched, revisited, prepared, drafted, corrected & amended the Technical Default Demand Letters to various loans (Arutyun Kusoyan, Bertha Sanchez, David Sherwin, Larry Bragato, Naren Bhakta, Robert Smith, TB Insurance, VS Investments) SBC's 7(a) loan portfolio's Servicing Issues (Delinquent Property Taxes, Stale Financial Statements, Insurance Coverage, Late Charges, etc.) & future Site Visit notification.	4.80 200.00/hr	960.00
2/1/2015	TAS	Loan Servicing Conference call with SBA re 3-AM sale proceeds, expenses, disbursements.	0.30 375.00/hr	112.50
2/2/2015	TAS	Loan Servicing Confer with Rafael re timing, proceeds, and disbursement of 3-AM foreclosure sale proceeds.	0.30 375.00/hr	112.50
2/16/2015	TAS	Loan Servicing Confer with Rafael re 3AM problems, pay-offs.	0.30 375.00/hr	112.50
2/2/2015	TM	Loan Servicing Prepared spreadsheet for Rafael. Entered new insurance info, made scans.	0.50 175.00/hr	87.50
2/3/2015	TM	Loan Servicing Received insurance declarations page for Intervention 911. Scanned, filed.	0.20 175.00/hr	35.00
	TM	Loan Servicing Received reinstatement notice for Airport Blvd. Note to spreadsheet and gave to Rafael for sending to buyer of 504's.	0.10 175.00/hr	17.50
	TM	Loan Servicing Received cancellation notice, email to Sherwin re same.	0.20 175.00/hr	35.00
2/4/2015	TM	Loan Servicing Received insurance info and updated spreadsheet and filed.	0.30 175.00/hr	52.50
2/19/2015	TM	Loan Servicing Call and email to insurance agent for Café Taboo re cancellation notice, told payment made.	0.20 175.00/hr	35.00

Thomas Seaman, Receiver for SBC

Page 11

			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2015	TM	Loan Servicing Calls and emails to agents for Sanchez and Sherwin re renewal of policies. Filed items that came in.	0.40 175.00/hr	70.00
2/23/2015	TM	Loan Servicing Received email with confirmation of payment for insurance for Café Taboo.	0.10 175.00/hr	17.50
	TM	Loan Servicing Review of insurance for Sherwin.	0.10 175.00/hr	17.50
	TM	Loan Servicing Call from Aung Solvang loan re balance, payoff info, etc. Email to Kristen to call him back and send him the info.	0.20 175.00/hr	35.00
	TM	Loan Servicing Called and LM with agent for Meyer's Castle re two policies. Email from agent re no response to renew policy. Email to agent and Rafael requesting new proposals.	0.80 175.00/hr	140.00
2/24/2015	TM	Loan Servicing Received emails re when new policy proposal will arrive for Meyer's Castle. Replied re same. Email to Garcia re same. LM with Garcia, email from broker.	0.50 175.00/hr	87.50
	TM	Loan Servicing Received new Evidence of Property Insurance for Complete Senior, replied to broker and requested.	0.10 175.00/hr	17.50
	TM	Loan Servicing Email from Senese re need for document for a loan which has been sold. Replied that Kristen will assist with contact info. Email to Kristen re same.	0.20 175.00/hr	35.00
2/25/2015	TM	Loan Servicing Checked with Rafael and Kristen re need to procure insurance for Meyer's Castle properties.	0.40 175.00/hr	70.00
	TM	Loan Servicing Filed insurance certs that came in to office.	0.20 175.00/hr	35.00
	TM	Loan Servicing Email to agent for O'Brien re need for renewed certs.	0.20 175.00/hr	35.00
	TM	Loan Servicing Email to agent for Z& H re need for renewed certs.	0.20 175.00/hr	35.00
2/26/2015	TM	Loan Servicing Email from broker re premium, reported to Rafael re same. Call to broker re same. Received additional email with proposal and responded. Email to Rafael re same. More emails, made spreadsheet	0.60 175.00/hr	105.00

Thomas Seaman, Receiver for SBC

Page 12

			<u>Hrs/Rate</u>	<u>Amount</u>
for proposals.				
2/26/2015	TM	Loan Servicing Received email with insurance certs for O'Brien. Placed in doc files and saved. Updates to spreadsheets.	0.20 175.00/hr	35.00
	TM	Loan Servicing Received cert for loan which was sold and gave to Rafael for forwarding.	0.10 175.00/hr	17.50
	TM	Loan Servicing Call to force place insurance, filled out application. Gathered info re construction.	1.00 175.00/hr	175.00
2/27/2015	TM	Loan Servicing Emails to a from broker re invoices. Replied re need for 3rd invoice.	0.30 175.00/hr	52.50
	TM	Loan Servicing Filed away certs which came into the office into the doc files.	0.20 175.00/hr	35.00
SUBTOTAL:			[ 130.40	20,709.50]
For professional services rendered			130.40	\$20,709.50
Balance due				\$20,709.50

## PROOF OF SERVICE

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 501 West Broadway, 15th Floor, San Diego, California 92101-3541.

On April 13, 2015, I served on interested parties in said action the within:

➤ **RECEIVER'S ADMINISTRATIVE MOTION FOR PAYMENT OF LOAN SERVICING COSTS FOR FEBRUARY 2015**

**BY U.S. MAIL:** by placing a true copy thereof in sealed envelope(s), addressed as indicated below. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service in San Diego County on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Mark Feathers  
1520 Grant Road  
Los Altos, California 94024

*Pro Se Defendant*

Tel: (650) 776-2496

Fax: (650) 961-2382

Email: markfeathers@sbcglobal.net

**BY OVERNIGHT DELIVERY:** by placing a true copy thereof in sealed envelope(s), addressed as indicated below. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited in a box or other facility regularly maintained by express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelopes or packages designated by the express service carrier, with fees for overnight delivery paid or provided for.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 13, 2015, at San Diego, California.

**Ted Fates**  
(Type or print name)

/s/ *Ted Fates*  
(Signature)